

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

**IN RE VALSARTAN,
LOSARTAN, AND IRBESARTAN
PRODUCTS LIABILITY
LITIGATION**

MDL No. 2875

**THIS DOCUMENT RELATES TO ALL
CASES**

**HON. ROBERT B. KUGLER
MDL NO. 19-2875 (RBK)**

**PLAINTIFFS' NOTICE OF DAUBERT MOTION TO
PRECLUDE THE DEFENSE EXPERT DAVID L. CHESNEY
FROM OFFERING CLASS CERTIFICATION OPINIONS**

TO: Jessica D. Miller, Esq.,
SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP
440 New York Avenue, N.W.
Washington, D.C. 20005
Attorneys for Defendants

PLEASE TAKE NOTICE that pursuant to MDL Text Order 2025, Plaintiffs shall move before the Honorable Robert B. Kugler, U.S.D.J., and the Honorable Thomas I. Vanaskie, Special Master, at the United States District Court for the District of New Jersey, 1 John F. Jerry Plaza, 4th and Cooper Streets, Camden, New Jersey, for an Order Precluding David L. Chesney from Offering Class Certification Opinions.

PLEASE TAKE FURTHER NOTICE that Plaintiffs shall rely upon the Brief and Certification of Adam M. Slater in support of the Motion.

PLEASE TAKE FURTHER NOTICE that Plaintiffs request oral argument pursuant to L. Civ. R. 78.1.

MAZIE SLATER KATZ & FREEMAN, LLC
Attorneys for Plaintiffs

By: /s/ Adam M. Slater

Dated: May 3, 2022

CERTIFICATE OF SERVICE

I hereby certify that on May 3, 2022, I electronically filed a partially redacted version of the foregoing documents with the Clerk of the Court using CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL. In addition, I hereby certify that unredacted copies of foregoing document will be served contemporaneous to filing via email on the Court, Special Master, and the Defense Executive Committee at DECValsartan@btlaw.com.

MAZIE SLATER KATZ & FREEMAN, LLC
Attorneys for Plaintiffs

By: /s/ Adam M. Slater

Dated: May 3, 2022